

June 7, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
225 12th Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Presentation, GN Docket No. 11-117; WC Docket No. 05-196; and PS Docket Nos. 10-255 & 11-153

Dear Ms. Dortch:

On June 5, 2013, Maurice Tosé, President, CEO, and Chairman of the Board of TeleCommunication Systems, Inc. (“TCS”) and Kim Scovill, Senior Director - Legal and Government Affairs, TCS, H. Russell Frisby, counsel to TCS, Chris Guttman-McCabe, Vice President, Regulatory Affairs, CTIA–The Wireless Association® (“CTIA”), and Brian Josef, Assistant Vice President, Regulatory Affairs, CTIA, met with Commissioner Jessica Rosenworcel and David Goldman, Legal Advisor, of the Federal Communications Commission (“Commission” or “FCC”) to discuss the Petition of TCS for Declaratory Ruling and/or Rulemaking.

During the meeting, TCS and CTIA representatives discussed the Obama Administration’s June 4, 2013 announcement of the need for swift action to address threats to innovators from patent assertion entities. As the President explained, these patent assertion entities produce no goods or services but “essentially leverage and hijack somebody else’s idea and see if they can extort some money out of them.” In seeking to effectively address these threats to U.S. innovation, the White House emphasized that, “[w]hile no single law or policy can address all these issues, much can and should be done to increase clarity and level the playing field for innovators.”

CTIA and TCS explained that, with respect to 28 U.S.C. § 1498, the FCC should clarify and provide guidance in the narrow context of 9-1-1 that: (a) based on 47 C.F.R. §§ 9.7 and 20.18 and Commission precedent, the provision of enhanced 911 (“E-911”) and next generation 911 (“NG-911”) location-based services is in furtherance and fulfillment of a stated Government policy; (b) the Commission is now aware that its stated policy may require application of a patent if an E-911 services provider is to comply with FCC regulations; and (c) E-911 and NG-911 location-based services are used with the authorization or consent of the Government.

TCS and CTIA representatives further stressed that Commission guidance will help ensure that the numerous lawsuits by patent assertion entities do not threaten the provision of emergency communications services, particularly at this critical time when the wireless industry and public safety community are working closely to develop and deploy text-to-911 and NG-911 solutions.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter and a copy of materials presented during the meeting is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions to the undersigned.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef
Assistant Vice President – Regulatory Affairs
CTIA-The Wireless Association®

Attachment

cc: Commissioner Jessica Rosenworcel
David Goldman